



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA

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Application of Southern California Edison )  
Company (U 338-E) for Authorization: (1) to )  
replace San Onofre Nuclear Generating Station )  
Unit Nos. 2 & 3 (SONGS 2 & 3) steam )  
generators; (2) establish ratemaking for cost )  
recovery; and (3) address other related steam )  
generator replacement issues. )

Application 04-02-026  
(Filed February 27, 2004)

**OPENING COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY**  
**(U 338-E) ON ATTACHMENTS TO ALJ'S RULING**

DOUGLAS K. PORTER  
CAROL A. SCHMID-FRAZEE

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-1337  
Facsimile: (626) 302-1935  
E-mail: [Carol.SchmidFrazee@sce.com](mailto:Carol.SchmidFrazee@sce.com)

Dated: **July 31, 2006**

**OPENING COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON  
ATTACHMENTS TO ALJ'S RULING**

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**I.**

**INTRODUCTION AND SUMMARY**

Pursuant to the Administrative Law Judge's Ruling Concerning Rehearing of Decision (D.) 05-12-040, dated June 22, 2006, (ALJ's Ruling), Southern California Edison Company (SCE) hereby submits its Opening Comments on how the Commission should take into consideration the correct Net Present Value (NPV) calculations for SCE's Steam Generator Replacement Program (SGRP) and calculate the Greenhouse Gas (GHG) adder using an accurate source of data.

The ALJ's Ruling implements D.06-06-040 in which the Commission granted limited rehearing of D.05-12-040 to: (1) take into consideration the correct net present value calculation for the SGRP; and (2) calculate the GHG adder using an accurate source of data. SCE has reviewed the net present value calculations for SGRP in Attachment A of the ALJ's Ruling and determined that those calculations are correct assuming replacement generation for San Onofre Nuclear Generating Station Unit Nos. 2 and 3 (SONGS 2 & 3) is not constructed until 2012. That being said, SCE disagrees with the assumption that the State of California should risk the loss of 2150 megawatts (MW) of power from SONGS 2 & 3 with no replacement until 2012. SCE recommends instead that the Commission modify D.05-12-040 to assume that replacement

generation is constructed in 2009-2010. With regard to calculation of the GHG adder, SCE has reviewed the values in Attachment B and agrees that these GHG values are appropriate for use in this proceeding.

## **II.**

### **THE NET PRESENT VALUE CALCULATIONS IN ATTACHMENT A TO THE ALJ'S RULING APPROPRIATELY REFLECT D.05-12-040**

SCE has reviewed the net present value calculations in Attachment A to the ALJ's Ruling. SCE's review confirms that these calculations assume construction of replacement generation for SONGS 2 & 3 in 2012. Therefore, these net present value calculations appropriately reflect current language in D.05-12-040.

As discussed below, SCE recommends modification of the language of D.05-12-040 to assume construction of replacement generation in 2009-2010, rather than replacement of the existing Table of Results with the net present value calculations in Attachment A.

#### **A. D.05-12-040 Was Very Optimistic By Assuming Construction Of Replacement Generation Until 2012**

D.06-06-040 granted limited rehearing of D.05-12-040. D.06-06-040 notes that the numbers in the "Table of Results" to D.05-12-040 assumed "that units 2 and 3 would shutdown in 2009-2010 without the SGRP."<sup>1</sup> That being said, D.05-12-040, "adopts a shutdown date of 2012 for use in the cost-effectiveness model."<sup>2</sup> D.06-06-040 then grants "limited rehearing . . . to calculate the net present values for the SGRP based on a shutdown date of 2012 . . ."<sup>3</sup> The numbers in the Table of Results for D.05-12-040 do assume construction of replacement generation for SONGS 2 & 3 in 2009-2010. This is the correct assumption for determining the net present value benefit of SGRP. D.05-12-040 assumed that SONGS 2 & 3 could continue

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<sup>1</sup> D.06-06-040, p. 5.

<sup>2</sup> Id.

<sup>3</sup> Id.

operating until 2012. This was a very optimistic assumption that construction of replacement generation could be deferred until 2012. SCE submitted detailed and persuasive evidence that, in the absence of SGRP, the construction of replacement generation was necessary in 2009-2010.<sup>4</sup> D.05-12-040 ignored this persuasive evidence, to the detriment of California ratepayers.

**B. SCE Recommends Modifying The Language Of D.05-12-040 To Assume Construction Of Replacement Generation In 2009-2010**

The ALJ's Ruling requests "comments on how the Commission should take into consideration the correct net present value for" SCE's SGRP. SCE recommends that the Commission modify the language of D.05-12-040 to assume construction of replacement generation in 2009-2010, and not modify the Table of Results in that decision. While SCE acknowledges that the net present value calculations in Attachment A to the ALJ's Ruling assume construction of replacement generation in 2012, the appropriate assumption is that construction of replacement generation should occur in 2009-2010.

**III.**

**THE GREENHOUSE GAS (GHG) VALUES IN ATTACHMENT B TO THE ALJ'S RULING WERE CORRECTLY TAKEN FROM THE E3 REPORT**

The ALJ's Ruling states that "the dollars per ton rates used to calculate the GHG adder were taken from the report titled 'Methodology and Forecast of Long-Term Avoided Cost for the Evaluation of California Energy Efficiency Programs' prepared by the Energy and Environmental Economics (E3) Consulting Group on October 25, 2004 (E3 Report)."<sup>5</sup> SCE has reviewed Attachment B to the ALJ's Ruling and determined the dollars per ton values in Attachment B were correctly taken from the E3 Report.

The ALJ's Ruling proposes to take official notice of the E3 Report in this proceeding. SCE does not oppose the Commission taking official notice of the E3 Report in this proceeding.

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<sup>4</sup> Citations.

<sup>5</sup> ALJ's Ruling, p. 2.

Furthermore, SCE does not take issue with the methodology utilized for calculating the GHG adder for the cost-effectiveness review of the SGRP in D.05-12-040.

**A. The Commission's Calculations Are Correct Using The Methodology Identified**

The ALJ's Ruling indicates that the GHG adder for each year of the SGRP cost-effectiveness study "is the product of the amount of GHG produced by such generation and the GHG dollars per ton rate for that year" from the E3 Report.<sup>6</sup> The ALJ's Ruling goes on to state that the GHG adder for SGRP as a whole is the present value of the GHG adders for each year of the forecast period.<sup>7</sup> SCE has reviewed the net present value of the GHG adder in D.05-12-040 and confirms that it is a correct calculation using the methodology identified in the ALJ's Ruling and the GHG values in Attachment B to the ALJ's Ruling.

**B. The Methodology Utilized Is Acceptable For This Purpose**

Ordering Paragraph No. 3 of the ALJ's Ruling states that "to the extent a party disagrees with the GHG adder calculation, it shall include in its comments a detailed explanation of how the calculation should be performed, including sources for input data, and why its proposal is reasonable."<sup>8</sup> The methodology utilized by the Commission in D.05-12-040 is acceptable for the purpose of determining SGRP cost-effectiveness. Therefore, SCE does not propose an alternative methodology in these comments.

**IV.**

**THERE IS NO NEED FOR EVIDENTIARY HEARINGS ON THESE ATTACHMENTS**

The ALJ's Ruling proposes to conduct the limited rehearing ordered by D.06-06-040 through the filing of Opening and Reply Comments addressing the information provided in Attachments A and B. SCE concurs with the ALJ's Ruling that the limited rehearing can be

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<sup>6</sup> ALJ's Ruling, p. 2.

<sup>7</sup> Id.

<sup>8</sup> ALJ's Ruling, Ordering Paragraph 3, p. 3.

conducted through the filing of Opening and Reply Comments on Attachments A and B. SCE sees no need for evidentiary hearings on Attachments A and B. Moreover, there is no material issue of fact raised by the information in Attachments A and B that would require additional evidentiary hearings in this docket.

V.

**CONCLUSION**

WHEREFORE, Southern California Edison Company respectfully submits its comments on Attachments A and B to the ALJ's Ruling. SCE respectfully requests that the Commission modify the language of D.05-12-040 to assume construction of replacement generation for SONGS 2 & 3 in 2009-2010, rather than adopting the revised Table of Results in Attachment A. This would resolve the inconsistency between the Table of Results and language of D.05-12-040. SCE does not object to the Commission taking official notice of the GHG values in Attachment B, taken from the E3 Report.

Respectfully submitted,

DOUGLAS K. PORTER  
CAROL A. SCHMID-FRAZEE

/s/

---

By: Carol A. Schmid-Frazee  
Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-1337  
Facsimile: (626) 302-1935  
E-mail: Carol.SchmidFrazee@sce.com

July 31, 2006

**CERTIFICATE OF SERVICE**

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of OPENING COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON ATTACHMENTS TO ALJ'S RULING on all parties identified on the attached service list(s).

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **31st day of July, 2006**, at Rosemead, California.

/s/  
Alejandra Arzola  
Project Analyst  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770

**A.04-02-026**

Monday, July 31, 2006

CASE ADMINISTRATION  
SOUTHERN CALIFORNIA EDISON  
COMPANY  
2244 WALNUT GROVE AVENUE, ROOM 370  
ROSEMEAD, CA 91770  
A.04-02-026

MICHAEL ALCANTAR  
ATTORNEY AT LAW  
ALCANTAR & KAHL LLP  
1300 SW FIFTH AVENUE, SUITE 1750  
PORTLAND, OR 97201  
A.04-02-026

Paul Angelopulo  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5031  
SAN FRANCISCO, CA 94102-3214  
A.04-02-026

SCOTT J. ANDERS  
RESEARCH/ADMINISTRATIVE CENTER  
UNIVERSITY OF SAN DIEGO - LAW  
5998 ALCALA PARK  
SAN DIEGO, CA 92110  
A.04-02-026

ROCHELLE BECKER  
SAN LUIS OBISPO MOTHERS FOR PEACE  
PO BOX 164  
PISMO BEACH, CA 93448  
A.04-02-026

MARTIN D. BERN  
ATTORNEY AT LAW  
MUNGER, TOLLES & OLSON LLP  
560 MISSION ST., 27/F  
SAN FRANCISCO, CA 94105  
A.04-02-026

SCOTT BLAISING  
ATTORNEY AT LAW  
BRAUN & BLAISING, P.C.  
915 L STREET, STE. 1420  
SACRAMENTO, CA 95814  
A.04-02-026

ANDREW B. BROWN  
ELLISON, SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95814  
A.04-02-026

Truman L. Burns  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4102  
SAN FRANCISCO, CA 94102-3214  
A.04-02-026

CENTRAL FILES  
CENTRAL FILES  
SAN DIEGO GAS & ELECTRIC  
8330 CENTURY PARK COURT  
SAN DIEGO, CA 92123-1530-1530  
A.04-02-026

GREG CHANG  
BLOOMBERG NEWS  
345 CALIFORNIA ST., STE 3500  
SAN FRANCISCO, CA 94104  
A.04-02-026

BOB CLARKE  
PRESIDENT  
CYPRESS POINT HOME OWNERS  
ASSOCIATION  
21 VIA CALANDRIA  
SAN CLEMENTE, CA 92672  
A.04-02-026

BRIAN T. CRAGG  
ATTORNEY AT LAW  
GOODIN MACBRIDE SQUERI RITCHIE &  
DAY LLP  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111  
A.04-02-026

LISA DECARLO  
STAFF COUNSEL  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET MS-14  
SACRAMENTO, CA 95814  
A.04-02-026

ROBERT DELGADO  
CITY OF RIVERSIDE  
3900 MAIN STREET  
RIVERSIDE, CA 92522  
A.04-02-026

LOS ANGELES DOCKET OFFICE  
CALIFORNIA PUBLIC UTILITIES  
COMMISSION  
320 W. 4TH STREET, SUITE 500  
LOS ANGELES, CA 90013  
A.04-02-026

DANIEL W. DOUGLASS  
ATTORNEY AT LAW  
DOUGLASS & LIDDELL  
21700 OXNARD STREET, SUITE 1030  
WOODLAND HILLS, CA 91367-8102  
A.04-02-026

LAW DEPT FILE ROOM  
PACIFIC GAS & ELECTRIC COMPANY  
PO BOX 7442  
PO BOX 770000 MAILCODE B30A  
SAN FRANCISCO, CA 94120-7442  
A.04-02-026

**A.04-02-026**

Monday, July 31, 2006

CENTRAL FILES  
CENTRAL FILES  
SAN DIEGO GAS & ELECTRIC  
8330 CENTURY PARK COURT  
SEMPRA ENERGY UTILITIES  
SAN DIEGO, CA 92123-1530-1548  
A.04-02-026

BRUCE FOSTER  
REGULATORY AFFAIRS  
SOUTHERN CALIFORNIA EDISON  
COMPANY  
601 VAN NESS AVENUE, STE. 2040  
SAN FRANCISCO, CA 94102  
A.04-02-026

MATTHEW FREEDMAN  
ATTORNEY AT LAW  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO, CA 94102  
A.04-02-026

LYN HARRIS HICKS  
G U A R D  
3908 CALLE ARIANA  
SAN CLEMENTE, CA 92672  
A.04-02-026

Donna J Hines  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4102  
SAN FRANCISCO, CA 94102-3214  
A.04-02-026

MARC D. JOSEPH  
ATTORNEY AT LAW  
ADAMS BROADWELL JOSEPH & CARDOZO  
601 GATEWAY BLVD., STE. 1000  
SOUTH SAN FRANCISCO, CA 94080  
A.04-02-026

CURTIS KEBLER  
GOLDMAN, SACHS & CO.  
2121 AVENUE OF THE STARS  
LOS ANGELES, CA 90067  
A.04-02-026

WENDY KEILANI  
SAN DIEGO GAS & ELECTRIC  
8330 CENTURY PARK COURT, CP32D  
SAN DIEGO, CA 92123  
A.04-02-026

STEVEN KELLY  
INDEPENDENT ENERGY PRODUCERS  
ASSN  
1215 K STREET, SUITE 900  
SACRAMENTO, CA 95814-3947  
A.04-02-026

ALISON KOTT  
DEPUTY CITY ATTORNEY  
CITY OF ANAHEIM  
200 S. ANAHEIM BLVD.  
ANAHEIM, CA 92805  
A.04-02-026

Donald J. Lafrenz  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
AREA 4-A  
SAN FRANCISCO, CA 94102-3214  
A.04-02-026

SANDY LAMBOY  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, MC B9A  
SAN FRANCISCO, CA 94105  
A.04-02-026

CONSTANCE LENI  
CALIFORNIA ENERGY COMMISSION  
1516 NINTH STREET  
SACRAMENTO, CA 95814  
A.04-02-026

RONALD LIEBERT  
ATTORNEY AT LAW  
CALIFORNIA FARM BUREAU FEDERATION  
2300 RIVER PLAZA DRIVE  
SACRAMENTO, CA 95833  
A.04-02-026

Mark R. Loy  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4205  
SAN FRANCISCO, CA 94102-3214  
A.04-02-026

DAVID MARCUS  
ADAMS BROADWELL & JOSEPH  
PO BOX 1287  
BERKELEY, CA 94701-1287-1287  
A.04-02-026

DON MAY  
CALIFORNIA EARTH CORPS  
4927 MINTURN AVENUE  
LAKEWOOD, CA 90712  
A.04-02-026

KAREN MOGLIA  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, MCB8R  
SAN FRANCISCO, CA 94105  
A.04-02-026

**A.04-02-026**

Monday, July 31, 2006

Pamela Nataloni  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 4300  
SAN FRANCISCO, CA 94102-3214  
A.04-02-026

GARY NOLFF  
CITY OF RIVERSIDE  
3900 MAIN STREET  
RIVERSIDE, CA 92522  
A.04-02-026

JEFFREY P. O'DONNELL  
ADMINISTRATIVE LAW JUDGE  
CALIF PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
ROOM 5111  
SAN FRANCISCO, CA 94102-3214  
A.04-02-026

JOSEPH O'FLANAGAN  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, ROOM 2477  
SAN FRANCISCO, CA 94105  
A.04-02-026

NORMAN A. PEDERSEN  
ATTORNEY AT LAW  
HANNA AND MORTON LLP  
444 FLOWER STREET, SUITE 2050  
LOS ANGELES, CA 90071  
A.04-02-026

AMY PETERS  
REGULATORY CASE ADMINISTRATOR  
SAN DIEGO GAS AND ELECTRIC COMPANY  
8330 CENTURY PARK COURT -CP32D  
SAN DIEGO, CA 92123-1530  
A.04-02-026

DOUGLAS K PORTER  
SOUTHERN CALIFORNIA EDISON  
COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
A.04-02-026

JENNIFER K. POST  
ATTORNEY AT LAW  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET  
SAN FRANCISCO, CA 94105  
A.04-02-026

Anne W. Premo  
CALIF PUBLIC UTILITIES COMMISSION  
770 L STREET, SUITE 1050  
SACRAMENTO, CA 95814  
A.04-02-026

JAMES ROSS  
REGULATORY & COGENERATION  
SERVICES, INC.  
500 CHESTERFIELD CENTER, SUITE 320  
CHESTERFIELD, MO 63017  
A.04-02-026

HELEN SABET  
ENERGY SPECIALIST  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET  
SACRAMENTO, CA 95814-5512  
A.04-02-026

J.A. SAVAGE  
CALIFORNIA ENERGY CIRCUIT  
3006 SHEFFIELD AVE.  
OAKLAND, CA 94602  
A.04-02-026

CAROL A. SCHMID-FRAZEE  
ATTORNEY AT LAW  
SOUTHERN CALIFORNIA EDISON  
COMPANY  
PO BOX 800  
ROSEMEAD, CA 91770  
A.04-02-026

NORA E. SHERIFF  
ATTORNEY AT LAW  
ALCANTAR & KAHL LLP  
120 MONTGOMERY STREET, SUITE 2200  
SAN FRANCISCO, CA 94104  
A.04-02-026

CHARLES D. SIEGAL  
Munger, Tolles & Olsen  
355 S. Grand Ave., 35th Fl  
Los Angeles, Ca 90071-1560  
USA  
A.04-02-026

JOHN W. SPIEGEL  
ATTORNEY AT LAW  
MUNGER TOLLES & OLSON  
355 SOUTH GRAND AVENUE, STE 3500  
LOS ANGELES, CA 90071  
A.04-02-026

T. ALANA STEELE  
HANNA AND MORTON, LLP  
444 S. FLOWER STREET, NO.1500  
LOS ANGELES, CA 90071  
A.04-02-026

DONNA STEVENER  
CITY OF RIVERSIDE  
3900 MAIN STREET  
RIVERSIDE, CA 92522  
A.04-02-026

**A.04-02-026**

Monday, July 31, 2006

JENNIFER SVOBODA  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, ROOM 959  
SAN FRANCISCO, CA 94105  
A.04-02-026

FRED SWEGLES  
SUN POST NEWS  
95 AVENIDA DEL MAR  
SAN CLEMENTE, CA 92672  
A.04-02-026

EILEEN M. TEICHERT  
DEPUTY CITY ATTORNEY  
CITY OF RIVERSIDE  
3900 MAIN STREET  
RIVERSIDE, CA 92522  
A.04-02-026

KAREN TERRANOVA  
ALCANTAR & KAHL  
120 MONTGOMERY STREET SUITE 2200  
SAN FRANCISCO, CA 94104  
A.04-02-026

SABRINA VENSUS  
ATTORNEY AT LAW  
LAW OFFICE OF SABRINA VENSUS  
171 PIER AVENUE, NUMBER 204  
SANTA MONICA, CA 90405  
A.04-02-026

JAMES F. WALSH  
ATTORNEY AT LAW  
SEMPRA ENERGY  
PO BOX 1831  
SAN DIEGO, CA 92112  
A.04-02-026

JAMES WEIL  
AGLET CONSUMER ALLIANCE  
PO BOX 37  
COOL, CA 95614  
A.04-02-026

LISA WEINZIMER  
CALIFORNIA ENERGY REPORTER  
PLATTS  
695 NINTH AVENUE, NO. 2  
SAN FRANCISCO, CA 94118  
A.04-02-026

JEFF WILLIS  
JW PACIFIC  
27281 LAS RAMBLAS, SUITE 200  
MISSION VIEJO, CA 92691  
A.04-02-026

KEVIN WOODRUFF  
WOODRUFF EXPERT SERVICES  
1100 K STREET, SUITE 204  
SACRAMENTO, CA 95814  
A.04-02-026

MRW & ASSOCIATES, INC.  
1999 HARRISON STREET, STE 1440  
OAKLAND, CA 94612-3517  
A.04-02-026

CALIFORNIA ENERGY MARKETS  
517 B POTRERO AVENUE  
SAN FRANCISCO, CA 94110-1431  
A.04-02-026